

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re, LISA FRANCIS, Debtor, TOYOTA LEASE TRUST, Movant, v. LISA FRANCIS, and KENNETH E. WEST, Trustee, Respondents.	Bankruptcy No. 22-10831-elf Chapter 13 Document No. 22, 27
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STIPULATION RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, Toyota Lease Trust (the "Movant"), by and through its undersigned counsel, Bernstein-Burkley, P.C., and, Debtor, Lisa Francis (the "Debtor"), by and through his undersigned counsel, Brad Sadek, Esquire, and together file this *Stipulation Resolving Motion for Relief from the Automatic Stay* (the "Stipulation"), stating as follows:

1. The automatic stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.
2. Movant has a secured interest in the 2020 Toyota Sienna Passenger Van XLE, VIN# 5TDYZ3DC2LS039737 (the "Vehicle").
3. As of the date of this Stipulation, the Debtor is in default of her post-petition payment obligations to Movant in the amount of \$4,377.70.

4. Debtor will cure the remaining post-petition arrears in the amount of \$4,377.70 through an Amended Chapter 13 Plan to be filed by Debtor and his Counsel. In order to resolving the pending the Motion, the parties agree as follows:

- a. Debtor shall have an Amended Chapter 13 Plan to provide for the \$4,377.70 in post-petition arrears.
- b. The terms of this Stipulation shall be incorporated into the Debtor's confirmed Chapter 13 plan and any subsequent plan filed thereafter.
- c. Movant shall be granted relief from stay upon lease maturity date of September 7, 2022.

5. This Stipulation may only be modified by a revised Stipulation filed on the docket in the Bankruptcy. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence. No written modifications are permitted, except for a revised Stipulation filed on the docket in the Bankruptcy.

Agreed to by:

By: /s/ Keri P. Ebeck
Keri P. Ebeck, Esq.
PA I.D. # 91298
601 Grant Street, 9th Floor
Pittsburgh, PA 15219
412-456-8112
Email: kebeck@bernsteinlaw.com

Counsel for Toyota Lease Trust.

Dated: August 29, 2022

By: /s/ Brad J. Sadek
Brad J. Sadek, Esq.
PA I.D. # 90488
1500 JFK Boulevard, Ste 220
Philadelphia, PA 19102
215-545-0008
Email: brad@sadeklaw.com

Counsel for Lisa Francis